

1 H. STAN JOHNSON (SBN 0265)  
STEVEN B. COHEN (SBN 2327)  
2 COHEN-JOHNSON LLC  
375 E. Warm Springs Road, Suite 104  
3 Las Vegas, NV 89119  
T: 702.823.3500  
4 Email: sjohnson@cohenjohnson.com  
Email: scohen@cohenjohnson.com  
5

COLBY B. SPRINGER (admitted *pro hac vice*)  
6 MIYA YUSA (admitted *pro hac vice*)  
MELENIE VAN (admitted *pro hac vice*)  
7 POLSINELLI LLP  
Three Embarcadero Center, Suite 2400  
8 San Francisco, CA 94111  
T: 415.248.2100  
9 Email: cspringer@polsinelli.com  
Email: myusa@polsinelli.com  
10 Email: mvan@polsinelli.com

11 MICHAEL P. DULIN (admitted *pro hac vice*)  
POLSINELLI PC  
12 1401 Lawrence Street, Suite 2300  
Denver, CO 80202  
13 T: 303.572.9300  
Email: mdulin@polsinelli.com  
14

Attorneys for Plaintiff  
15 IMAGEKEEPER, LLC

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF NEVADA  
18

19 IMAGEKEEPER, LLC, a Nevada limited  
20 liability Company,

21 Plaintiff,  
22 v.

23 WRIGHT NATIONAL FLOOD  
INSURANCE SERVICES, LLC, a  
24 Delaware limited liability Company, and  
EVOKE TECHNOLOGIES PRIVATE  
25 LIMITED, an Ohio foreign corporation,

26 Defendants.  
27  
28

Case No. 2:20-cv-01470-CDS-VCF

**JOINT STIPULATION AND ORDER  
FOR EXTENSION OF TIME FOR  
PLAINTIFF IMAGEKEEPER, LLC TO  
RESPOND TO DEFENDANT WRIGHT  
NATIONAL FLOOD INSURANCE  
SERVICES, LLC'S MOTION FOR  
SUMMARY JUDGMENT [DKT. NO. 218]**

**[FIRST REQUEST]**

Pursuant to Local Rules IA 6-1 and 6-2, Plaintiff ImageKeeper, LLC (“Plaintiff”) and Defendant Wright National Flood Insurance Services, LLC (“Defendant”), (collectively the “Parties”), by and through their counsel of record, hereby stipulate and respectfully request an order for an extension of time for Plaintiff to respond to Defendant’s Motion for Summary Judgment for Failure to Adequately Disclose Trade Secrets (Dkt. No. 218) (“Motion for Summary Judgment”) filed on April 27, 2022.

This is the first stipulation requesting an extension of time to respond to Defendant’s Motion for Summary Judgment. The Parties are taking four depositions of fact witnesses between May 9, 2022 and May 12, 2022. In addition, counsel for Plaintiff, Polsinelli LLP, is having its annual attorney retreat May 11-14, 2022. The depositions and retreat include out of state travel for the attorneys in this case. The current deadline for Plaintiff to respond to Defendant’s Motion for Summary Judgment is May 18, 2022. Plaintiff has requested, and Defendant has agreed, to stipulate to an extension of two weeks up to and including June 1, 2022 for Plaintiff to respond to Defendant’s Motion for Summary Judgment. The Parties also agree that Defendant’s reply to Plaintiff’s response will be extended an additional week up to and including June 22, 2022.

The extension to the deadline for Plaintiff to respond to Defendant’s Motion for Summary Judgment will not affect any other deadlines or hearing dates in this action.

**WHEREFORE**, the undersigned parties respectfully request that the Court approve the present stipulation as follows:

- The deadline for Plaintiff to respond to Defendant’s Motion for Summary Judgment is extended by fourteen (14) days up to and including June 1, 2022.
- The deadline for Defendant to file a reply to Plaintiff’s response is extended an additional seven (7) days up to and including June 22, 2022.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Dated: May 12, 2022

Respectfully submitted,

POLSINELLI LLP

/s/ Miya Yusa

By: Colby B. Springer (admitted *pro hac vice*)  
Miya Yusa (admitted *pro hac vice*)  
Melenie Van (admitted *pro hac vice*)  
POLSINELLI LLP  
Three Embarcadero Center, Suite 2400  
San Francisco, CA 94111  
T: 415.248.2100  
cspringer@polsinelli.com  
myusa@polsinelli.com  
mvan@polsinelli.com

H. Stan Johnson (SBN 0265)  
Steven B. Cohen (SBN 2327)  
COHEN-JOHNSON LLC  
375 E. Warm Springs Road, Suite 104  
Las Vegas, NV 89119  
T: 702.823.3500  
sjohnson@cohenjohnson.com  
scohen@cohenjohnson.com

Michael P. Dulin (admitted *pro hac vice*)  
POLSINELLI PC  
1401 Lawrence Street, Suite 2300  
Denver, CO 80202  
T: 303.572.9300  
mdulin@polsinelli.com

Attorneys for Plaintiff  
IMAGEKEEPER, LLC

1 Dated: May 12, 2022

Respectfully submitted,

2 DUANE MORRIS LLP

3  
4 /s/ Jordana A. Garellek

By: Dominica C. Anderson  
Terry W. Ahearn  
D. Stuart Bartow  
Daniel B. Heidtke  
Jordana A. Garellek  
Brianna M. Vinci

8 Attorneys for Defendant  
9 Wright National Flood Insurance  
10 Services LLC

11  
12 **IT IS SO ORDERED.**

13  
14 Dated: May 13, 2022

  
15 CRISTINA D. SILVA  
16 UNITED STATES DISTRICT JUDGE